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Attorney for Daniel T. Bower

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	:	Case No. 2:12-CR-00321-GMN-PAL
	:	
Plaintiff,	:	
	:	
v.	:	<b>STIPULATION TO</b>
	:	<b>CONTINUE REVOCATION</b>
DANIEL T. BOWER,	:	<b><u>HEARING</u></b>
	:	
Defendant.	:	

**IT IS HEREBY STIPULATED AND AGREED**, by and between Dayle Elieson, Acting United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for the United States of America (hereinafter “the Government”), and Nicholas Wooldridge, Wooldridge Law Ltd., counsel for Daniel T. Bower (“the Defendant”) (collectively, “the Parties”), that the revocation hearing presently scheduled for December 11, 2018 at the hour of 11:00 a.m., be vacated and set to a date and time convenient to this court but not earlier than sixty (60) days.

1 The Stipulation is entered into for the following reasons:

2 1. Counsel for the defendant requires additional time to obtain and review additional  
3 discovery from the Department of Probation and investigate the case and determine whether  
4 motions need to be filed in this case.  
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6 2. Denial of this request for continuance would deny counsel for the defendant  
7 sufficient time to effectively represent the Defendant, taking into account the exercise of due  
8 diligence, and result in a miscarriage of justice.  
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10 3. The defendant is not in custody, and consents to the continuance.

11 This is the First Stipulation to continue filed in this case.

12 DATED: December\_\_\_\_\_, 2018

13 WOOLDRIDGE LAW, LTD.

DAYLE ELIESON  
Acting United States Attorney

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15  
16 By /s/ Nicholas M. Wooldridge  
NICHOLAS M. WOOLDRIDGE  
17 Counsel for Daniel T. Bower

By /s/ Daniel J. Cowhig  
Daniel J. Cowhig  
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,	:	Case No. 2:12-CR-00321-GMN-PAL
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Plaintiff,	:	
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v.	:	<b>STIPULATION TO</b>
	:	<b>CONTINUE REVOCATION</b>
DANIEL T. BOWER,	:	<b><u>HEARING</u></b>
	:	
Defendant.	:	

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time as defense counsel needs sufficient time to obtain and review additional discovery from the Department of Probation and investigate the case and determine whether motions need to be filed in this case.

2. The defendant does not object to the continuance.

3. The parties agree to the continue the revocation hearing for at least sixty (60) days from December 11, 2018.

4. The additional time requested herein is not sought for purposes of delay, but to allow the parties to explore a negotiated resolution and permit counsel for defendant sufficient time within which to be able to effectively complete investigation of the discovery materials provided.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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3 **CONCLUSIONS OF LAW**  
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5 The ends of justice served by granting said continuance outweigh the best interest of the  
6 public and the defendant in a speedy trial, since the failure to grant said continuance would be  
7 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
8 opportunity within which to be able to effectively and thoroughly prepare for the revocation  
9 hearing, taking into account the exercise of due diligence.  
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11 **ORDER**

12 **IT IS THEREFORE ORDERED** that the revocation hearing presently scheduled for  
13 December 11, 2018, at the hour of 11:00 a.m., be vacated and continued to the 22nd day of  
14 February, 2019 at the hour of 11:00 a.m.  
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16 DATED this 6 day of December, 2018.

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19 UNITES STATES DISTRICT JUDGE  
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